

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVANI MARGARITO PEREZ,

Defendant.

) INDICTMENT

) 1 : 20 CR 223

) CASE NO. _____

) Title 21, United States Code,
) Sections 841(a)(1) and (b)(1)(A)

) JUDGE OLIVER

COUNT 1

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury charges:

1. On or about March 9, 2020, in the Northern District of Ohio, Eastern Division, Defendant JOVANI MARGARITO PEREZ did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

FORFEITURE

The Grand Jury further charges:

2. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegation of Count 1 is hereby re-alleged and incorporated herein by reference. As a result of the foregoing offense, Defendant JOVANI MARGARITO PEREZ shall forfeit to the United States any and all property constituting or derived from any proceeds he obtained, directly or indirectly, as a result of the said violation; and, any and all property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violation;

including, but not limited to, the following: approximately \$18,000.00 in U.S. currency seized on March 9, 2020.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.